

Kirst, Tina

From: Eppler, David
Sent: Friday, March 12, 2021 3:27 PM
To: Kirst, Tina
Cc: Ortiz, Diana
Subject: FW: Doyle Site - insurance documents

Tina, Dee Dee,

Per your request, the 12/18/20 email regarding Doyle Site insurance

From: Glenn, Janessa Marie <Janessa.Glenn@klgates.com>
Sent: Friday, December 18, 2020 10:43 AM
To: Schilling, Leonard <Schilling.Leonard@epa.gov>; Morton, Steve <Steve.Morton@klgates.com>
Cc: Eppler, David <Eppler.David@epa.gov>
Subject: RE: Doyle Site - insurance documents

Thanks for this. Appreciate your follow-up.

From: Schilling, Leonard <Schilling.Leonard@epa.gov>
Sent: Thursday, December 17, 2020 4:26 PM
To: Morton, Steve <Steve.Morton@klgates.com>; Glenn, Janessa Marie <Janessa.Glenn@klgates.com>
Cc: Eppler, David <Eppler.David@epa.gov>
Subject: FW: Doyle Site - insurance documents

Janessa and Steve

Per item 4 in my previous e-mail, attached are the demand letters sent to the other potentially responsible parties. Please let me know if you have any questions.

Regards,
Leonard

Leonard E. Schilling Jr.
Assistant Regional Counsel
EPA Region 6
(214) 665-7166

From: Schilling, Leonard
Sent: Friday, December 11, 2020 4:59 PM
To: 'Glenn, Janessa Marie' <Janessa.Glenn@klgates.com>; Morton, Steve <Steve.Morton@klgates.com>
Cc: Eppler, David <eppler.david@epa.gov>
Subject: RE: Doyle Site - insurance documents

Janessa and Steve

I apologize for the delay in getting back to you. Please see the following responses to your questions from our November 20 call:

1. Evidence attached to Entergy Demand Letter

You asked about documentation regarding individual transformers that was attached to the demand letter to Entergy. The documents have the heading "Salvage & Disposal." I confirmed with my client that Entergy submitted these documents to EPA as part of Entergy's response to the Section 104(e) information request.

2. Scottsdale Insurance Company

You asked about a document with information regarding the Scottsdale Insurance Company that you received in response to a FOIA request. In its response to EPA's Section 104(e) information request, SWEPCO provided information about Scottsdale, including certificates of insurance naming FJ Doyle as the insured. The document you received in your FOIA response was my client's separate research into Scottsdale.

3. Completion Report

You asked about EPA's completion report for the removal action. Please see the attached report. The attachments to the report are too voluminous to send via e-mail. If you would like the attachments, I recommend filing a FOIA request. The FOIA folks would be able to get the attachments to you quicker than me.

4. Evidence of Liability of Other PRPs

You asked for evidence of liability for the other parties that received the demand letter. I'm still working with my client on this action item and hope to have more information for you next week.

Regards,

Leonard

Leonard E. Schilling Jr.
Assistant Regional Counsel
EPA Region 6
(214) 665-7166

From: Schilling, Leonard
Sent: Monday, November 23, 2020 3:22 PM
To: Glenn, Janessa Marie <Janessa.Glenn@klgates.com>
Cc: Morton, Steve <Steve.Morton@klgates.com>
Subject: RE: Doyle Site - insurance documents

Steve and Janessa

Thanks for the phone call on Friday. I'm working on the insurance company issue and the other action items from our call, but it may be next week before I'm able to respond. I need to consult with our technical folks, and most of them are out this week. I'll get back to you as soon as I can.

Thanks,
Leonard

Leonard E. Schilling Jr.
Assistant Regional Counsel
EPA Region 6

(214) 665-7166

From: Glenn, Janessa Marie <Janessa.Glenn@klgates.com>
Sent: Friday, November 20, 2020 1:37 PM
To: Schilling, Leonard <Schilling.Leonard@epa.gov>
Cc: Morton, Steve <Steve.Morton@klgates.com>
Subject: Doyle Site - insurance documents

Thanks for visiting with us today.

Attached are the three pages we received in a second packet from our earlier FOIA request. As Steve mentioned, we are interested in what you may know about the insurance company.

Thanks.
Janessa



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